AFFIDAVIT
OF
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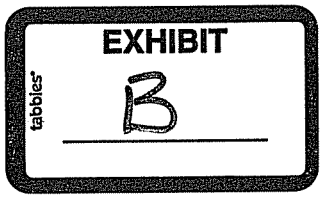
My name is Kathryn Vandyke. I started work at Lexington Connector Seals in August of 1990. When I started out I was a 100% inspector. I worked in that position for a couple of months after, which I moved into the Quality Department as a Quality Technician. I continued in that capacity for a few months and then moved into the position of Layout Technician. I stayed there for a few years as Layout Technician, probably until about 1995, at which time I moved into the position of Quality Engineer. I stayed as Quality Engineer until December 15, 2000 at which time I resigned the position and left Lexington.

In my position as a Layout Technician we had to do PPAP, Production Part Approval Process, reports for our customers. These reports consisted of doing a 100% dimensional and visual inspection on every cavity in every tool to submit to a customer for the first piece inspection.

When I first started in the Layout Department we measured every piece and every dimension called out on the blueprint per customer requirements. As time went on we did less pieces and less dimensions because we had a due date for the PPAP that had to be met and we were told to "get these reports out—do what you have to do but get them out on time." These reports weren't supposed to be late. We didn't have the time to do all the measurements and checks properly.

While I worked under Lorraine Cerimele she would try to buy us time so we could do more of our job properly but we still had times come up when we were told to do random dimensions. "Get the report out—do what you have to do but get it out on time."



We put in a lot of hours, the other Layout Tech's. and myself. We worked a lot of overtime to try and measure these parts properly and get the reports out on time but sometimes we would have several reports with the same or close to the same due date and the pressure was put on us. Management didn't care what we had to do at that point they just wanted the reports out on time. That's when we would have to cheat on the reports. We didn't want to do it and we would get upset about it but we all knew we had to do it if we wanted to keep our jobs.

All PPAP reports started with a tool qualification, which meant Engineering, would run the new tool and submit 5 pieces, one piece from each corner and the center of the tool. These five pieces were measured and checked 100% to the blueprint dimensional callouts. After we had the measurements on the five pieces we would pick the highest measurement and the lowest measurement that we came up with for each dimension and we would set up a random function on the report in the computer where we could hit the F9 key on the keyboard and the report was automatically filled in with numbers and the report was done. We did not measure any of the parts from the other cavities in the tool. We printed the report and finished the PPAP package and sent it.

In effect the computer was falsifying measurements for many of the cavities. They were not being measured. The customer took these reports as being our accurate measurements of all parts, every cavity and every dimension to the blueprint. They would just review the report as though we had done all the measurements and they would use the parts based on that information. What was really bad was that not only was the customer unknowingly approving their tool based on false numbers, but almost every tool was either out of specification or visually poor or both. Keith almost always denied every request to rework the tool.

The numbers were totally made up. We would set up the random command so the computer would take the highest value and the lowest value that we had measured on these few pieces and enter measurements on the report so that they fell within these limits. That is how the F9 command was set up so we knew no measurements on the report would be out of spec.

If we were allowed to have, say for an example, 3.50 + or – 0.10 tolerance, we would set the random command to maybe go from 3.495 down to 3.41 so we were within our tolerance. That way we knew the measurements would never be out of spec. even though we had no idea what those parts really measured because we never took a true measurement. The customer trusted us. They were signing off their approval of the tool that they owned based on those falsified measurements. The customer didn't know they were false. I think they did this because we had built previous trust in with our customers. The first few years we did PPAP reports we did a very good job. We were allowed to do our job and our customers had faith in us so they had no reason to check our parts or to re-measure them. So after a few years when we had to do the "fudging" there was no question about it.

We probably started doing random dimensioning on the documents in about 1996, early 1996, because that's when the wasteless-flashless program started and the new tools came in. By way of explanation of what the impact of this is you would have to understand a little bit of the 100% dimensional process that goes into these parts. A customer purchases a tool and Lexington builds that tool per their blueprint. When the tool comes in it can have anywhere from 300 to 1,000 cavities on a big plate and that's what produces each part.

There is also a tool print. A tool print can have anywhere from 100 individual dimensions describing that part, all the way up to thousands. In some cases we had

prints with 7,500 dimensions on them. This means you've got this 1,000-cavity tool and each cavity produces a part. If that part per the blueprint has 500 dimensions to it then you have to take 1,000 cavities starting with cavity 1; take cavity 1 and dimensionally inspect that part per the 500 dimensions specified on the print; then you go to cavity no. 2 and you do all 500 dimensions on cavity no. 2 and so on until you get up to the total 1,000 cavities. That was what was supposed to happen. What actually happened, from I would say December 1995 all the way through to present and how the system turned out to be was we had to fudge the data. We were forced to do this. We could no longer afford to do it the right way. We were under a lot of pressure and the orders were " you will meet the customers deadline, no matter what it takes." So the Layout Technicians didn't want to just pull numbers completely out of the air, instead they tried to do the fudging in a more scientific manner. Their system was that they would take cavity no. 1 and they would fully measure it to the 500 dimensions. Then they would take cavity no 10, skipping 2 – 9, and fully measure it, then take cavity no. 20 and fully measure it. Of all of the dimensions they would take the highest measurement and the lowest measurement for all 500 dimensional callouts. These measurements were then used to random the remainder of the report. If any dimensions were out of spec. to the print we were told to just put them in spec either on the low side or the high side, wherever they fell. We were not allowed to reject the tool, even though we should have, ---we were not allowed. Engineering, the Quality Manager, Process Engineers would all look at the parts and agree that they were bad but when the final decision would come from Keith it would be to put the dimensions in spec. and get the report out.

We were not allowed to reject the tools, per Keith Blockinger, because to reject the tool would mean that we had to send it back to the tool shop to get it fixed. Keith

was the only person that was allowed to authorize this, so we could write up a rejection report, and we did, but we were not allowed to act on it. We had to continue on with the report as though the tool was within specifications.

What they did was, they'd pick the highest measurement, from five pieces they actually measured, on each dimension (if it was out of spec. they would make it in spec.) and put it into the computer program. The same thing was done for the lowest measurement. Once the random formula was set up they would push the F9 key on the computer and based on the high and the low measurement the computer would randomly assign measurements to all the other dimensions and all of the other cavities that were never touched. They were numbers basically the computer pulled out of the air based on the highs and lows of the few cavities actually measured.

The Layout Techs. were never comfortable with this method, particularly if we had any calls from a customer questioning any dimensions on our report or our part later down the road because we would go back and reference these reports and we had no idea if this was the way it was originally measured or if this was a made up dimension. We had no starting point to go back to because a lot of the information would be false. We were very concerned about what we were doing as Layout Technicians.

We would keep an internal rejection log per tool and we would fill out the paperwork. Almost every tool that came in had something wrong with it. We did not receive tools that were completely within specification, some parts were just worse than others, but to cover ourselves as Layout Technicians, we would write up a rejection report on what was wrong with the tool. The report, however, didn't mean anything because the tool was never allowed to leave the building to be reworked and repaired

unless it was so bad the error could not be hidden from the customer. We had to fudge the data but a least we had that record.

We were forced to use the tool as is; tell the customer it was within specification; tell the customer it was a perfect tool; tell the customer there was nothing wrong with it. By the end of the year, by looking at the rejection log, we would come to find out that only 85%, and that's probably giving it a lot of credit, that over 85% of the tooling that come through the door should have gone back for repair because dimensionally it was out of specification.

When we had a tool rejection in the Layout Department we would write up a tool rejection report. We would specify what the problem was in detail and then we would submit it to our Quality Manager, Lorraine Cerimele at that time, for her approval and to have it dated. They were submitted to her for her approval of the rejection and the reason for the rejection. Most of the time, well probably 99% of the time, Lorraine would have to come to the Layout Department to actually view the part and review our reasons; actually see the part on the screen and know why we were rejecting that part unless it was so clear that she didn't need to see the screen but she always double checked to make sure why we were rejecting the part before she would go further with. It would then go to Keith Blockinger. We could never do anything with the tool. We had to wait for his direction on it.

Whenever we had a rejection a lot of times Lorraine would approve it. She'd date it and it would go to Keith. It would come back to us and would be rejected by Keith. We knew then that we had to send the report out on that tool and sometimes we'd have Keith come pacing the room. He'd be saying, "when are you going to get this out?"; "are you going to get this out today?"; "is that going to go on time?"; "it has to go, it has to go." We had a lot of pressure to get these reports out, even though we

knew the tool was bad. We had to send it out. There wasn't anything we could do at that point.

We had Lex Tech, which was a company of ours, build tools for us. We knew every time we got a tool from them that it was going to be bad and of course being under the gun with getting these reports out we were very nervous about this. We were not happy at all when we knew we were going to have to fudge data on a tool. We knew coming through the door the tools had defects somewhere and we might miss it because we had to do this with the data. We knew we weren't allowed to reject it because it was our tool shop trying to make money. Lexington was channeling our tools through Lex Tech instead of outside sources for purpose of making money with no regard toward ability of meeting customers blueprints.

We had tools come in that wouldn't be cut right and we'd tell Keith. As an example, some of the tools needed all four sides to be the same dimension and thickness, but the tool would come in and have a thin side and a thick side. Keith would say well that's the tool, we can't do anything about it unless we build a self-registering tool which would allow the tool enough movement to have the sides come out pretty equal all the time. Well, we would be told "no" to a self-registering tool because the cost would be too great. We're going to use it like it is. So, we would have a small side, which would be put into spec. on the low side and we would have a high side which would be put into spec. on the high side. The data was manipulated and the report submitted like that. We would not reject the tool.

We had to write rejections on these tools when they came in, mostly from Lex Tech. We had rejections all the time and we knew Keith would give us directions that we could not reject them so we had to allow for this when we were going through our QS-9000 process. QS-9000 requires that we buy from an approved supplier list. That

means that these suppliers have to meet certain qualifications: on time delivery, rejections weren't allowed or it was very minimal. We knew Lex Tech did not meet these requirements so in our QS-9000 procedures we wrote a clause that said we could buy from only an approved supplier list or company dictated suppliers because we were told we had to get the tools from Lex Tech. Lex Tech would never meet the qualifications under QS-9000 and we knew that we could not buy from them unless we put the clause in.

Whenever we would submit tool rejections to Lorraine there were times that we would be waiting for her to give her approval so that we could do something with the tool. Well it would get to Lorraine and she would sign it. Next thing we knew Keith would be in her office and they would have a pretty heated discussion. I couldn't tell what they were saying but I knew it was a pretty intense discussion and then the next thing I knew the door would be shut. They could be in there for quite sometime. An hour, maybe even a couple of hours, and then Lorraine would come back to the Layout Department and she would tell us "this tool has to go out the way it is." At that point we would have to do whatever was needed to make an approved report to send to the customer.

In late 1998, probably the last quarter of 98, we had AMP coming in as a big potential customer and they were making demands on our Layout Department as far as how they wanted their reports done and handled, their dimensioning and every little thing on the report. Lorraine would tell them and Keith that all the demands they were making were not feasible with the people we had, we needed more people if we were going to meet all of this criteria. She was kind of our buffer, going back and forth, to make sure we could get their parts the way they wanted them. I know they had several meetings about this. There were several disagreements between her and Keith because

AMP would come up as a subject and there would be closed-door meetings and then Lorraine would come to the Layout Department with the information on what we were going to do with AMP. After Lorraine left the company we wrote a procedure on how AMP was going to be handled. Everything AMP wanted was put into writing that we were to do. Lorraine had fought very hard against this because she knew it wasn't feasible to do it with the people at Lexington. We wrote everything into a procedure step-by-step. We tried to do it but we couldn't with the people we had. We ended up fudging AMP reports and the way that we did our production on the tooling was not to their requirements either. We fudged the information and submitted it to AMP. That's the way we had to do it to keep AMP as a customer. We had no buffer anymore after Lorraine left. No one to buy us time so that we could do our reports more accurately, more to our liking, more to the way it was suppose to be done. Gloria Knight, who took Lorraine's place as Quality Manager, always had us do what Keith wanted. Didn't matter if it was right or wrong, if Keith wanted it, it was done and done his way. We had, as an example, what we call capability studies which we do on a set number of pieces to see how capable the parts are of holding the dimensions that are required on the blue print. We stated to AMP that we would pull these parts from the four corners and the center cavity of the tool, four groups at a time, we would do these at 20 minute intervals, which would take all of first shift and into our second shift to pull these parts. If problems occurred it could even go into third shift. The Quality Technician would put the parts into separate baggies. The baggies would be labeled when the parts were pulled as to the tool number, the time, the operator running the tool, etc. All pertinent information was on a label on this little bag, 100 bags in all. Layout would lay these parts out, in the order they were pulled during production, to do a capability study. We tried to follow the procedure but when several tools came in at one time it was too

time consuming or if a tool was late coming in we could not do it properly and meet the PPAP due date. We just couldn't do it. We would run AMP tools and put the parts in the baggies. If we didn't have time for the 20-minute intervals we would make up the time the parts were pulled to show 20-minute intervals. It wasn't always accurate information. We got to the point, I would say in late 1999, early 2000, where sometimes we didn't even pull these parts. We just took four corners and center cavity numbers, from a cavity map, and put those on our report. We would make up the 20-minute intervals and put those on our report. We would take measurements that were in the PPAP dimensional report. We would take a high value and a low value and make up the information. We would let the computer put in random numbers to make up the capability report while all along we were telling AMP that we were doing this according to this set procedure and we were not. We didn't even measure the parts. If AMP came into the plant to watch a tool being run, then we would certainly do it the right way.

When we had to do reports such as this, in a very hurried manner and fudge information, we definitely were very uncomfortable. We didn't like to do it. I would personally go to the Quality Manager, Gloria Knight, who replaced Lorraine, and I would tell her "we need more time on this—we can't do it right—we're not doing it by AMP procedures." She in turn would talk to Keith about it but when she would come back to me she would say "Keith wants this report out, it has to be out on time, it cannot be late, you do what you have to do but get the report out." Those were always my instructions. Keith wants it out—you do what you have to do—you get it out.

There were numerous occasions when an AMP report was due and Keith would come into the Layout room and he would be pacing around the room and watching what we were doing and say: "is this report going out?" "This report has to go out".

There were occasions he would say, "do what you have to do, get it out". Those were his exact words. Other times he'd be outside the windows of the Layout Department making trips back and forth almost all day long making everybody extremely nervous. You knew whatever it took is what you had to do because that report was going out that day.

Now, whenever I'm talking about being told to "do what you have to do to get a report out" that would mean if we had thousands of dimensions to do yet and we knew there was no way to physically measure parts we would have to go into the computer, set up the random F9 command, let the computer pull the fictitious numbers and put them in that report so we could print it and get it out.

If it meant we never touched a part, that's what we had to do, because we were told in the past how to do this when it came down to the deadline and we had to do whatever we were taught to do. We were taught not to pull pieces. Don't even look at the pieces, just do the numbers. It was the number game and we played it. We were taught to play it very well. Even though we didn't approve of it we were taught to play it very well.

The practices that we were taught to do, that we didn't agree with, we would at times bring this up as an issue to our Quality Manager. I'm talking about Gloria Knight, who came in 1999; she would always tell me "if they don't like their job—if they don't like what they're doing—we can find somebody else to do it". She always told us that there was nobody working there that could not be replaced.

In 1999, when Gloria Knight took over as Quality Manager, things became really stressful and started going downhill. We noticed an increase in customer complaints and at one point she made the comment herself that it was becoming a full time job. She spent all of her day taking customer complaints.

I knew customer complaints were on the increase because I was involved with the computer database, where the information was inputted. Even with these customer complaints increasing the Quality Department was put under more and more pressure to work harder with fewer personnel to do the job.

We had one SPC Tech., as opposed to having one on each shift when Lorraine was in the plant. Our SPC was done by pulling four corners and the centerpiece from tools in regular intervals as requested by the customer or specified directly on a blue print.

We would pull these pieces from the presses, but towards the end of the time when I was there, I would say the last part of the year 2000, especially the last half, we never actually measured a part. We made up the measurements to make a good SPC chart to put in the file drawer so that when the customer wanted the information it was available.

I asked for more people to do the work. I was always told "no, you're not going to get any more people—you just do what you have to do—SPC is nonsense. We really are only doing it to satisfy the customer anyway so we're not going to do true SPC on these parts". So we would have all made up data. We didn't have any data that was true and accurate data by the last part of the year 2000. We would put these charts in a file drawer. There were some customers who required this information on a quarterly basis so we sent them false information. We didn't know what was there. Parts that we might have a problem with in-house, we would bring up front and measure and do SPC data on them if they were out of spec. We particularly had a problem with wall thickness on AMP parts. We were always told, "well just put them in on the low side—make the chart look good and file it in the drawer".

When we were told this, it was usually through the direction of our Quality Manager, Gloria Knight, but we knew this directly came from Keith Blockinger because nothing was done in the plant without Keith's authority. None of us had authority to give that direction to anyone else, so it was always passed down the line and it would start at Keith, to Gloria, to myself and of course by the time it got to me I had to walk in and tell people to just fudge information. It was very stressful and it actually got to the point where I couldn't do it anymore. It was taking a toll on me both physically and mentally. At the end of 2000, when I left the company, I just couldn't do it anymore.

We had SPC data that was fudged. We had yearly reports that a customer required that we have on file for them which they could request at any time, all fudged. This data was totally made up. We would do it with what I referred to before as the random in the computer by putting random commands in the report. We would never pull a part, we would never touch a part from the floor but instead we would put random commands in the computer and random a report. For instance a 400-cavity tool, all 400 cavities had random data. We would leave it in the computer like that so that next year all we had to do was hit the F9 key, print the report out, put it in the file drawer and it was there for customers to see. No part was ever touched. These were supposed to be actual yearly reports done on the parts to assure the dimensional requirements were being held and we didn't do them.

We had a lot of information like that. We were getting to a point where we didn't have the personnel to do it properly. We'd random the information and make it look good for the customer. When we performed capability studies and if we could actually measure the parts, we had to reach what we called a Cpk capability of a 1.33 or higher and if we came up with anything lower that would never pass we had to make up information and put it on the chart to make it read 1.33 or higher. So even at times

when we actually measured parts some of the information was changed. It was a good chart in the eyes of the customer. We had some parts we never measured because we knew they never reached the 1.33 level or even close. This was because of the tool, which Keith said would not be fixed.

Some of the parts that we were fudging data on were AMP ABS seals, which went into a braking system on automotive equipment. These seal parts could leak, I don't know how far the damage would go for that, but in my mind, it could be pretty serious if these parts didn't function properly. Even beyond the aspect of the part being out dimensionally we would have some visual issues. For instance a heavy flash on the outside of the part. AMP told us "under no circumstances were we to wash or tumble these parts". Well, we would hand pick the flash off when we sent an initial report to AMP and sent them all pretty perfect parts, which we knew we could not even produce in the plant, and after we got an approval on the PPAP report we would run these parts in production. We would wash and tumble the parts even though it stated clearly on our Control Plan that we could only wash or tumble with an AMP approval. AMP would sign-off on the Control Plan and that became a living document and we were supposed to go by that. Instead we would by-pass it without the customer's approval.

Inside the plant we would be told through direction, which would come from Keith and production, that these parts had to go through tumble and deflashing. We were told to send them out because they would not scrap them. The reason they had flash on them to begin with is because when the new tool came in through Layout, the parts ran with flash during initial processing. Even though we rejected the tool in Layout due to this excessive flash and it being dimensionally out of specification, Keith would not send the tool back for re-work.

Keith knew the parts ran flashy and he knew the parts were out of specification on the AMP anti-lock brake systems. I believe there are five parts to the anti-lock brake system. There are four or five that went to the anti-lock brake system. Every one of them had that issue of flash and being out of spec. dimensionally yet Keith refused to re-work or replace the tool. We had to PPAP it as id—fudge the data—clean up the parts by hand and pick the flash off to make them look picture perfect, even though that wasn't reality, so as to get the tools approved by AMP.

Once they were approved by AMP they demanded that the parts that they received internally were to look just like the initial sample and they did not allow us to tumble and we were not allowed to wash these parts. Keith agreed to those AMP demands. I put it in the Control Plan, AMP approved it, we approved it and yet Keith Blockinger knew there was no way we could ship parts to AMP from production without washing and tumbling them because they were full of flash from the get-go, brand new tools in the door.

During the last quarter of 1998 we went into a cure-time reduction process in our plant because Keith had told everyone that we needed to produce more parts at a faster pace so we did a cure-time reduction study through the Layout Department. They would reduce the cure-time and we would dimensionally measure these parts and visually inspect them to see what effect it had. We would find some of these parts would be out of spec. dimensionally and were involved with excessive defects because of the cure-time reduction. We would write up a report. We had a team. The whole team would sign-off on this report with our findings and everything that we found. We would submit the report to Lorraine, who in turn would submit it to Keith. When we would find any problems with the cure-time reduction we wanted it stopped and put back to the original cure-time. Lorraine would take this to Keith, tell him our findings

and tell him that we recommended it be put back to original cure-time. Every time our report would come back to us and they would state that we did a good job, however, they're going with the reduced cure-time. That would be Keith's decision to use the reduced cure-time. It always came to a money issue. When they had to produce these parts faster, they apparently were going to produce them regardless of what our findings were and it became very frustrating because we felt we were wasting our time doing these reports when they didn't mean anything anyway. Whenever it went to Keith he wasn't paying any attention to the data anyway, so he was going to do it his way regardless.

In 1999, because of this cure-time reduction, we ran into some problems with Packard Electric and they said, "you will put these cure-times back to the original cure-time". They put some of them back, but Lexington still continued to play with the cure-time reduction. If they were in a process of this cure-time reduction on any tools when Packard would come in we would all scurry around to get all the documents changed to reflect the cure-time that Packard had specified. I mean the whole plant would be in a flurry; everybody going around to make sure everything and all bases were covered. Then everything was changed back to where it needed to be for Packard's approval because they would do random checks on it and of course during all this it was very, very stressful. Even though Lexington knew that these parts would come out bad and the customer didn't wand it hey still continued to do things their own way and definitely hid it from the customer. Anytime they'd, come in, the paperwork or any paperwork on the floor would be grabbed up, it would be replaced by what they, Lexington, wanted the customer to see. We changed documents so many times we couldn't even keep track of it.

During our QS-9000 certification when we were preparing for our audit we had parts sitting in the plant that were rejected parts that we could not ship to customers. To make it through our audit and get the approval that we needed from QS-9000 Keith rented five semi-trailers to put all these parts in. We moved all of these defective parts into these trailers and we parked them across the street next to a vacant plant so no one would have any knowledge whatsoever of all the defective parts that we produced in our plant since this would not look good during a QS-9000 audit. These parts stayed in these trailers for quite some time. There was a point that we forgot about them for awhile because they were in the trailers. We couldn't actually show the parts during the QS-9000 audit or what truly was supposed to be in the 100% inspection room.

While Lorraine was there they kept trying to reduce the size of the inspection room. They kept building walls and making the inspection room smaller and smaller. In 1999, whenever Lorraine left, we were more or less under the direction of Keith Blockinger. He brought Gloria Knight in as Quality Manager. All of our controls were then taken away. As far as the quality from the press operator, they were not required to be accountable for what they produced therefore a lot of our product was going to the 100% inspection room until eventually some of the walls were torn down and the whole room was filled with boxes of rejected product. If I were to estimate I would say 80% of everything produced in that plant went to 100% inspection room and a lot of times our Control Plan did not designate that function to the customer. The customer thought their product was being produced as a direct-ship part which meant it was produced on the presses; that it was produced with a high-quality that could be taken straight from the press; put into a box and sent to them. When in fact, it was going through 100% inspection which is probably 80% accurate so therefore defective parts were being shipped to our customers. We knew our parts were not being run well at

the presses but yet Keith never put anything in place to take care of it. It was always, we'd produce a part and then the Quality Department was responsible to inspect the quality into the part after it was produced, which anybody knows is an impossible task. You can't do it. Everything was production, production, production. We were required to worry about quality as an after-thought.

Whenever I talk about us fudging data on reports and doing things that we knew was not the correct way to do them it was because we had threats from Keith about doing away with the entire Quality Department in 1992 and then again about 1995. So whenever I say "we did what we had to do" we knew what Keith required of us as a Quality Control team to meet his demands. We didn't have a choice and we knew it was either do it or our job was on the line. We were constantly in fear of when he was going to do away with the Quality Department. He always talked about doing away with the 100% inspection department also. He wanted to get rid of that, because it was another quality aspect.

So, it was a constant thing. We had to continuously worry about our jobs because he, Keith, was so production minded. He wasn't into the quality mode of it and he felt that Quality was more or less holding him back. It was over-head that was costing the company money and it served no direct purpose as far as he was concerned.

In the year 2000, whenever I was supervising the Layout Department, SPC and Document & Data Control, I noticed a big impact on the morale of the people in the department. Everything they were forced to do that they didn't like, such as fudging data and more or less lying to customers on reports, morally affected them. I constantly asked for more people but they, management, would not give them to me. As a result my people would come with "OK, they want this don on X days—we'll get it done"—they didn't care how they got it done. They were going to get it done because

they knew they had to and it was just a very bad attitude that prevailed. It was very difficult to work with people like that because they were just so beaten down that they didn't care anymore. We use to really care about what we did in there. We wanted to do a good job. We knew that when Lorraine was there we were at least important to her as our Quality Control Manager.

When Lorraine left we had no self-importance whatsoever. So, it got very difficult and very stressful. Everyday I would try to build these people up to get the work done that we needed to do. They would constantly tell me we can't do it, we're tired, we're burned out, we're putting in too much overtime, which they were. They were over-timed to death especially for the tedious type of work they had to do. It was very difficult, but I could not get relief for them.

I would go to my Quality Manager, Gloria Knight, who took Lorraine's position, and I would say "Gloria, we need people to do this work properly." She would come back to me and say "Keith said we're not getting any more people in there. You do whatever you need to do, but these reports will go our on time, you're not getting any more help in the department." That's the answer I always got. So by the end of the year 2000 everything was so stressful in there and the fudging of documents was like an everyday practice on almost everything. I couldn't do it anymore. I left the company.

Kathryn Van Dyke

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STATE OF OHIO)
) ss.
TRUMBULL COUNTY)

Before me a notary public in and for the above state and county this 21st day of August, 2001, personally appeared Kathryn VanDyke who on her oath did state that she read and signed the foregoing affidavit and it is true as she verily believes.

Christina Parrish
NOTARY PUBLIC

NOTARIAL SEAL
STATE OF OHIO

CHRISTINA PARRISH, Notary Public
State of Ohio
My Commission Expires 8/10/05